



Re: Follow-up on PCB Cleanup Notification - 100 California Street 

Carmen Santos to: Marc Gille

06/02/2010 11:59 AM

Bcc: Steve Armann

From: Carmen Santos/R9/USEPA/US  
To: "Marc Gille" <MGille@BroadwayPartners.com>  
Bcc: Steve Armann/R9/USEPA/US@EPA

Hello, Marc:

I appreciate your follow-up message on the PCB cleanup for 100 California. Please send the message (together with its attachment) that you intended to forward to me via your June 1, 2010 message attached below.

Rather than continuing to go back and forth with comments and revisions, I propose that you consider our strategy for approving PCB cleanup Notifications. We issue conditional approvals whenever that is possible. If the Notification is lacking in some way, we will establish conditions of approval. These could potentially involve conditions that, for instance, address issues not covered in the Notification that should have been covered, clarifications, and if necessary, requests for additional samples. A revised Notification would not be necessary. The conditions of approval would take care of such revisions.

Please submit your Notification. If questions arise while reviewing the Notification, I will call you.

The Notification must be accompanied by a written certification signed by the property owner and the party conducting the cleanup. The certification must include the language in 40 CFR 761.61(a)(3)(E) and that in 761.3 (Definitions) under "*Certification*." The Notification should also include a sampling and analysis plan. This plan is for the cleanup verification samples since the caulking material was already sampled and found to contain PCBs at and above 50 ppm PCBs.

Please call me at 415.972.3360 if you have any questions.

Regards,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
USEPA Region 9  
415.972.3360  
fax: 415.947.3533

"Marc Gille"

Carmen-

06/01/2010 03:28:08 PM

From: "Marc Gille" <MGille@BroadwayPartners.com>  
To: Carmen Santos/R9/USEPA/US@EPA  
Cc: Steve Armann/R9/USEPA/US@EPA, "Chaudel Baker" <CBaker@BwayRes.com>  
Date: 06/01/2010 03:28 PM  
Subject: Follow-up on PCB Cleanup Notification- 100 California Street

Carmen-

I have been requested to follow-up on the email below regarding EPA comments to the proposed

notification plan. First, thank you for your further comments and it appears that we might be close to the end.

I noticed was that there could be the possibility of "further comments" upon submission. I appreciate that the final notification plan needs to be certified, but I think that it would be appropriate for any other comments to be addressed prior to certification so that we can finish this plan prior to my submission for ownership signature.

Lastly, your statement that, "the cleanup levels and rationale need to be well supported and explained in the "notification plan." I understand that the testing results are consistent with the guidance given in CFR 761.61. If there is something missing, please explain so that we can address it.

Thanks again for your prompt reply.

Best regards,

Marc

Marc Gille  
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